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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
 ORACLE AMERICA, INC., a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 SETH RAVIN, an individual,

Defendants.

CASE NO. 2:10-cv-0106-LRH-PAL

**DECLARATION OF KIERAN P.  
 RINGGENBERG IN SUPPORT OF  
 PLAINTIFFS ORACLE'S MOTION TO  
 EXCLUDE TESTIMONY OF  
 DEFENDANTS' EXPERTS SCOTT  
 HAMPTON, BROOKS HILLIARD,  
 DAVID KLAUSNER, AND JAMES  
 BENGE**

Judge: Hon. Larry R. Hicks

1 I, Kieran P. Ringgenberg, declare as follows:

2 1. I am an attorney admitted to practice law in the State of California and before the  
3 Court in this action *pro hac vice*. I am a partner with Boies, Schiller & Flexner LLP, counsel to  
4 Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation  
5 (collectively “Oracle”) in this action. This declaration is made in support of Plaintiffs’ Motion to  
6 Exclude Testimony of Defendants’ Experts Scott Hampton, Brooks Hilliard, David Klausner,  
7 And James Benge. Based on my involvement in the discovery process and my review of the  
8 files and records in this action, I have firsthand knowledge of the contents of this declaration and  
9 could testify thereto.

10 2. Attached to the Appendices of Exhibits in Support of Oracle International  
11 Corporation’s Opposition to Rimini Street Inc.’s and Seth Ravin’s Motion to Bifurcate  
12 (“Appendices”) as Exhibit 1 is a true and correct copy of a document produced by defendant  
13 Rimini Street, Inc. in this action and appearing to be an email from Beth Lester to Dennis Chiu,  
14 dated April 6, 2007, which has been marked as PTX 2152.

15 3. Attached to the Appendices as Exhibit 2 is a true and correct copy of a document  
16 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from Beth  
17 Lester, to Seth Ravin, dated April 11, 2007, which has been marked as PTX 18.

18 4. Attached to the Appendices as Exhibit 3 is a true and correct copy of a document  
19 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from  
20 Dennis Chiu to George Lester copying Seth Ravin and Michael Davichick, May 31, 2007, which  
21 has been marked as PTX 20.

22 5. Attached to the Appendices as Exhibit 4 is a true and correct copy of a document  
23 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from Susan  
24 Tahtaras to Tim Conley, dated November 14, 2008, which has been marked as PTX 40.

25 6. Attached to the Appendices as Exhibit 5 is a true and correct copy of a document  
26 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from  
27 Krista Williams to Jeff Allen, dated February 10, 2009, which has been marked as PTX 50.

28 7. Attached to the Appendices as Exhibit 6 is a true and correct copy of a document

1 produced by defendant Rimini Street, Inc. in this action and appearing to be a Weekly Status  
 2 Report for Jeff Allen for the period of 2/8/2009 to 2/14/2009, dated February 14, 2009, which  
 3 has been marked as PTX 51.

4 8. Attached to the Appendices as Exhibit 7 is a true and correct copy of a document  
 5 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from Brian  
 6 Slepko to Jeff Allen, Susan Tahtaras and Dennis Chiu, dated February 14, 2009, which has been  
 7 marked as PTX 52.

8 9. Attached to the Appendices as Exhibit 8 is a true and correct copy of a document  
 9 produced by defendant Rimini Street, Inc. in this action and appearing to be an email from Ed  
 10 Freeman to Jim Benge, copying Brenda Davenport, Dennis Chiu, Kevin Maddock, Krista  
 11 Williams, Sara Lu, and Tim Conley, dated October 1, 2009, which has been marked as PTX 60.

12 10. Attached to the Appendices as Exhibit 9 is a true and correct copy of the Expert  
 13 Report of Elizabeth A. Dean, dated January 17, 2012.

14 11. Attached to the Appendices as Exhibit 10 is a true and correct copy of the Expert  
 15 Report of Christian B. Hicks, dated February 6, 2012.

16 12. Attached to the Appendices as Exhibit 11 is a true and correct copy of the Expert  
 17 Report of Brooks L. Hilliard, dated March 30, 2012. Attached to the Appendices as Exhibit 11-  
 18 A is a true and correct copy of the Expert Report of Brooks L. Hilliard, dated March 30, 2012,  
 19 and marked to indicate the portions of the report subject to Oracle's Motion to Exclude.

20 13. Attached to the Appendices as Exhibit 12 is a true and correct copy of the Expert  
 21 Report of David Klausner, dated March 30, 2012. Attached to the Appendices as Exhibit 12-A is  
 22 a true and correct copy of the Expert Report of of David Klausner, dated March 30, 2012, and  
 23 marked to indicate the portions of the report subject to Oracle's Motion to Exclude.

24 14. Attached to the Appendices as Exhibit 13 is a true and correct copy of the Expert  
 25 Report of Scott D. Hampton, dated March 30, 2012. Attached to the Appendices as Exhibit 13-  
 26 A is a true and correct copy of the Expert Report of Scott D. Hampton, dated March 30, 2012,  
 27 and marked to indicate the portions of the report subject to Oracle's Motion to Exclude.

28 15. Attached to the Appendices Exhibit 14 is a true and correct copy of the Rebuttal

1 Report to the Expert Report of David Klausner by Christian B. Hicks, dated May 16, 2012.

2 16. Attached to the Appendices as Exhibit 15 is a true and correct copy of excerpts  
3 from the deposition of Scott D. Hampton, taken on May 25, 2012.

4 17. Attached to the Appendices as Exhibit 16 is a true and correct copy of excerpts  
5 from the deposition of Brooks L. Hilliard, taken on June 5, 2012.

6 18. Attached to the Appendices as Exhibit 17 is a true and correct copy of excerpts  
7 from the deposition of Jim Benge, taken on June 21, 2012.

8 19. Attached to the Appendices as Exhibit 18 is a true and correct copy of excerpts  
9 from the deposition of David Klausner, taken on June 15, 2012.

10 20. Attached to the Appendices as Exhibit 19 is a true and correct copy of Business  
11 Automation Associates Inc.'s website at <http://www.bizauto.com>, downloaded at my direction  
12 on July 21, 2015

13 21. Attached to the Appendices as Exhibit 20 is a true and correct copy of a document  
14 produced by Oracle in this action that appears to be Oracle's Customer Connection Terms of  
15 Use, which has been marked as PTX 19.

16 22. Attached to the Appendices as Exhibit 21 is a true and correct copy of a document  
17 produced by defendant Rimini Street, Inc. in this action and appearing to be an Instant message  
18 between c\_limburg and kpedn, which has been marked as PTX 48.

19  
20 I declare that the foregoing is true under penalty of perjury of the laws of the United  
21 States.

22 Executed this 22nd day of July, 2015, at Oakland, California.

23  
24 /s/ Kieran Ringgenberg  
25 Kieran Ringgenberg  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of July, 2015, I electronically transmitted the foregoing **DECLARATION OF KIERAN P. RINGGENBERG IN SUPPORT OF PLAINTIFFS ORACLE'S MOTION TO EXCLUDE TESTIMONY OF DEFENDANTS' EXPERTS SCOTT HAMPTON, BROOKS HILLIARD, DAVID KLAUSNER, AND JAMES BENGE** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Catherine Duong

An employee of Boies, Schiller & Flexner LLP